

ORIGINAL



0000163536

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

Arizona Corporation Commission

DOCKETED

JUL 01 2015

COMMISSIONERS

Susan Bitter Smith, Chairman

Bob Stump

Bob Burns

Doug Little

Tom Forese

2015 JUL -1 P 2:19

AZ CORP COMMISSION
DOCKET CONTROL

DOCKETED BY

MUB

IN THE MATTER OF RESOURCE
PLANNING AND PROCUREMENT IN
2013 AND 2014

DOCKET NO. E-00000V-13-0070

Comments of Western Resource Advocates

On June 16, 2015, Commissioner Little requested comments from interested parties regarding the timing of Integrated Resource Plan (IRP) submissions by Arizona utilities, with respect to EPA's final Clean Power Plan. Western Resource Advocates (WRA) appreciates this opportunity to offer comments on this issue.

WRA believes the Commission should maintain its April 1, 2016 deadline for utilities to file Integrated Resource Plans. EPA is expected to release its final rules regulating carbon pollution from existing coal-fired generation units pursuant to Section 111(d) of the Clean Air Act in August or September of 2015. These rules are commonly known as the Clean Power Plan (CPP). This timeline will give utilities more than six months to react to the final rules, incorporating any additional analysis or modeling that may be necessary to accommodate changes from the proposed rule that was issued in June of last year. Undoubtedly, prudent utilities have already been assessing the impact of the CPP as proposed, prior to its finalization. Though the final CPP

may change in some respects, it will necessarily be a logical outgrowth of the existing proposal and, as a result, those changes should not affect the ability of utilities to file timely IRPs.

Further, timely utility IRPs will provide valuable information that state agencies can use to develop a state plan to comply with the CPP. The insights and information that will become available as the utility IRPs are developed and finalized over the next six to eight months will allow state air and utility regulators to better understand the benefits and costs of different CPP compliance strategies. In sum, a delay in filing of IRPs beyond April of 2016 would deprive the State of valuable information that will be helpful in developing a timely and effective CPP state compliance plan with EPA.

Respectfully submitted this 1st day of July 2015.

A handwritten signature in black ink, appearing to read "Ken Wilson", is positioned above a horizontal line.

Kenneth L. Wilson, Engineering Fellow and Policy Analyst
John Nielsen, Clean Energy Program Director
Western Resource Advocates
2260 Baseline Road, Suite 200
Boulder, CO 80302
ken.wilson@westernresources.org
john.nielsen@westernresources.org

Original and 13 copies mailed to Docket Control.